

Luis Rene Velasco
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Nogales AZ 85621

FILED

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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA

CLERK
U.S. BANKRUPTCY
DISTRICT OF ARIZONA

In re:

Luis Rene Velasco
Debtor

BANK OF AMERICA, N.A.
Movant

vs

Luis Rene Velasco, Debtor;
Dianne C. Kerns, Trustee
Respondents

Chapter 13 Proceeding
4:09-bk-23695-JMM

RESPONSE TO MOVANT'S MOTION
TO LIFT THE AUTOMATIC STAY

(544 Multy Ct.
Rio Rico AZ 85648)

Comes now debtor and for his response to Movant's Motion to Lift the Automatic Bankruptcy Stay, and enters the following:

1. Answering paragraphs 1 through 4, debtor admits the allegations therein.
2. Answering paragraph 5, debtor admits the default and accruing late charges but denies the amount.
3. Answering paragraph 6, debtor denies the allegations therein.
4. Answering paragraph 7, debtor admits the allegations therein and has no objection to Movant contacting Debtor regarding a potential Forbearance Agreement, Loan Modification, Refinance Agreement, or other Loan Workout/Loss Mitigation Agreement.
5. Answering paragraph 8, debtor admits the allegations therein.

WHEREFORE, having fully answered the motion, Debtors pray that same be denied, that they have their costs incurred herein, that they have their attorney's fees as and when incurred, and that they have such other and further relief as may be deemed just and proper, in the premises.

Dated this 26th day of April 2010.



Luis Rene Velasco

A copy of the foregoing mailed this date to:

DIANNE C. KERNS, TRUSTEE
7320 N LaCholla
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by 
